Koch, Kristine

From: Koch, Kristine

Sent: Monday, April 20, 2015 7:56 AM

Subject: FW: Portland Harbor RI

Kristine Koch Remedial Project Manager USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency Region 10 1200 Sixth Avenue, Suite 900, M/S ECL-122 Seattle, Washington 98101-3140

(206)553-6705 (206)553-8581 (fax) 1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

From: Koch, Kristine

Sent: Monday, April 20, 2015 7:56 AM

To: 'Jen Woronets'

Cc: Jim McKenna (jim.mckenna@verdantllc.com); Gene Revelas; Bob Wyatt; Patty Dost

Subject: RE: Portland Harbor RI

Jen – I think some of the differences in the dates are due to the fact that the LWG submitted written comments, not redlines. I incorporated the agreed language after that. It is untrue that the LWG had custody of the comments. Until EPA formally submits our comments, they are still considered draft. Section 7 version was the version disputed, so there should be no surprises there. The versions of Section 10 were all based on negotiations with the LWG. In order to complete the RI, EPA will be directing the LWG to produce the document with the versions that I have. If the LWG needs extra time, then they need to request an extension. I suggest you wait and see what is sent before requesting an extension.

Regards,

Kristine Koch Remedial Project Manager USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency Region 10 1200 Sixth Avenue, Suite 900, M/S ECL-122 Seattle, Washington 98101-3140

(206)553-6705 (206)553-8581 (fax) 1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

From: Jen Woronets [mailto:jworonets@anchorqea.com]

Sent: Friday, April 17, 2015 5:41 PM

To: Koch, Kristine

Cc: Jim McKenna (jim.mckenna@verdantllc.com); Gene Revelas; Bob Wyatt; Patty Dost; Jen Woronets

Subject: RE: Portland Harbor RI

Kristine,

The following email is provided on behalf of Gene.

Hi Kristine -

I placed your list of RI Sections in the table below (left two columns) and compiled the dates and names of the files that we are working with in the right two columns. The file dates that are highlighted are those where the EPA and LWG dates don't concur. In all cases, the EPA date is later than the LWG date so to address your specific question, we are not aware of any later versions. We also note that for Sections 7 and 10 you are working on revision versions that are higher in number than the versions we have.

The RI Process Agreement states, "It is EPA's expectation that the LWG will be incorporating our modifications and working on addressing all of EPA's comments as they receive them, particularly, changes to tables, figures and Appendices, so we do not expect there will be a need for an extension beyond the 30-day timeframe for a draft Final RI Report, which is expected to be delivered in electronic format only." Therefore, our assumption during this RI revision process was that once EPA and LWG completed negotiations on each section, the LWG/Integral had custody of that section. Since Section 10 negotiations concluded in January, we have been working on the necessary report-wide RI editorial task. Our shared objective was to avoid having overlapping versions of sections that need to be rectified. It appears from the dates in the table below that EPA continued to revise some RI content in parallel with our efforts. The examples of the changes you made in Sections 1 and 3 seem minor (we suspect EPA and the LWG have been making similar edits in compiling the final full document). However, you indicate that you "will also be sending additional direction on tables, maps and figures (either providing them again or a matrix with directions)". Also, based on the REV #'s in your email it appears that you have made changes to Sections 7 and 10 that we have not seen. This is a concern because we did not anticipate further EPA changes/directions until after we had submitted the electronic version of the complete RI later this spring. The note regarding the data products is disconcerting because, as you know, the RI data products are numerous, particularly in Section 5, and we have been working through Section 5 for some months now rectifying call outs, revising numbers, re-labeling, etc.

In order to streamline finalization of the RI we'd like to propose, consistent with the RI revision process, that you hold on to the changes you've made subsequent to the section-by-section meetings, and let us complete and submit the electronic version of the full revised RI per the changes we've negotiated to date on all sections, plus the EPA changes on the single outstanding RI section (the Executive Summary, LWG draft provided to EPA on 2-12-15). EPA can then comment on the complete electronic version of the RI with additional directed changes.

Thanks and we are available to discuss this any time as needed.

Gene

EPA Revision #	EPA File Date	LWG File Date	LWG Revision #
Section 1*	8/25/2014	11/30/2012	Section 1
- · · · ·	5/10/2010	/0.0 /0.0	
Section 2	6/13/2013	11/30/2012	Section 2
Section 3, Rev 4**	4/15/2015	4/26/2013	Section 3, Rev 4
Section 4, Rev 1	4/26/2013	4/26/2013	Section 4, Rev 1
Section 5.0/5.1, Rev 1***	4/15/2015	7/25/2014	Section 5.0/5.1, Rev 1
Section 5.2, Rev 1	8/21/2014	7/29/2014	Section 5.2, Rev 1
Section 5.3, Rev 1	8/11/2014	8/11/2014	Section 5.3, Rev 1
Section 5.4, Rev 1	8/4/2014	8/4/2014	Section 5.4, Rev 1
Section 5.5, Rev 1	8/11/2014	8/11/2014	Section 5.5, Rev 1
Section 5.6, Rev 1	8/8/2014	8/8/2014	Section 5.6, Rev 1
Section 6, Rev 1	12/23/2014	6/6/2014	Section 6, Rev 1
Section 7, Rev 3	9/12/2014	12/6/2013	Section 7
Section 8	4/24/2013	4/19/2013	Section 8
Section 9, Rev 1	9/26/2013	9/26/2013	Section 9, Rev 1
Section 10.1, Rev 5	3/20/2015	1/13/2015	Section 10.1, Rev 2
Section 10.2, Rev 3	2/13/2015	1/13/2015	Section 10.2, Rev 2

^{* -} EPA added in the language from an email to make a sentence consistent between Sections 1 and 4.

Let us know if you have any questions.

Thank you, Jen Woronets © Anchor QEA, LLC <u>jworonets@anchorqea.com</u> 421 SW Sixth Avenue, Suite 750 Portland, OR 97204 503-972-5014

Please consider the environment before printing this email.

^{** -} EPA made a change to the river being the 19th largest by volume to make it consistent with other sections

^{*** -} EPA made changes to number of COCs, but then changed it back, so this should be as previously

The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, please be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this electronic transmission in error, please notify us by electronic mail at jworonets@anchorqea.com

From: Koch, Kristine [mailto:Koch.Kristine@epa.gov]

Sent: Thursday, April 16, 2015 10:25 AM

To: Jim McKenna (jim.mckenna@verdantllc.com); Gene Revelas

Cc: Jen Woronets

Subject: Portland Harbor RI

Jim and Gene – I wanted to give you a heads up on the versions of the text that I was sending on these. I will also be sending additional direction on tables, maps and figures (either providing them again or a matrix with directions). Let me know if you think that there was a later version.

Section 1 Date 8/25/14 – I added in the language from an email to make a sentence consistent between

Sections 1 and 4.

Otherwise, language is same as you saw previously.

Section 2 Date 6/13/13

Section 3, Rev 4 Date 4/15/15 – I just made a change to the river being the 19th largest by volume to make it

consistent with other

Sections. Otherwise, language is same as you saw previously.

Section 4, Rev 1 Date 4/26/13

Section 5.0/5.1, Rev 1 Date 4/15/15 – I made changes to number of COCs, but then changed it back, so this should be

the same as you

saw previously.

Section 5.2, Rev 1	Date 8/21/14
Section 5.3, Rev 1	Date 8/11/14
Section 5.4, Rev 1	Date 8/4/14
Section 5.5, Rev 1	Date 8/11/14
Section 5.6, Rev 1	Date 8/8/14
Section 6, Rev 1	Date 12/23/14
Section 7, Rev 3	Date 9/12/14
Section 8	Date 4/24/13
Section 9, Rev 1	Date 9/26/13
Section 10.1, Rev 5	Date 3/20/15
Section 10.2, Rev 3	Date 2/13/15

Kristine Koch

Remedial Project Manager

USEPA, Office of Environmental Cleanup

U. S. Environmental Protection Agency

Region 10

1200 Sixth Avenue, Suite 900, M/S ECL-122

Seattle, Washington 98101-3140

(206)553-6705

(206)553-8581 (fax)

1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)